

Exhibit 17  
Reply E-Mail from Defense Counsel to Exhibit 15

**From:** Anne VanderBroek anne@vanderbroeklaw.com  
**Subject:** Re: Dates for Rule 26(f) Conference re; Werking v Werking  
**Date:** May 6, 2019 at 3:12 PM  
**To:** Miles Greengard mgreengard@powersgreengard.com



Miles,

After meeting with my clients today, we are rejecting your offer of settlement.

I understand about being type A and wanting to get dates scheduled, but I would prefer to wait until Judge Maloney rules on our MTD and SJ motions. If he denies them, we will then file an answer. Until an answer is on record, I don't think we can proceed with discovery or a scheduling order.

Should it reach discovery, we will have substantial requests, including producing purchase receipts or other proof as to damages for each item. I anticipate a voluminous discovery, should we reach that point.

The figure consists of four separate, identical black stepped bars arranged in a 2x2 grid. Each bar has a total width of 10 units and a height of 4 units. The bars are composed of two segments: a top segment of width 8 units and a bottom segment of width 2 units. The height of the top segment is 3 units and the height of the bottom segment is 1 unit. The bars are positioned such that their right edges form a larger square frame.

Thanks,  
Anne

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**From:** Miles Greengard <[mgreengard@powersgreengard.com](mailto:mgreengard@powersgreengard.com)>

**Date:** Monday, May 6, 2019 at 1:06 PM

**To:** Anne VanderBroek <[anne@vanderbroeklaw.com](mailto:anne@vanderbroeklaw.com)>

**Subject:** Dates for Rule 26(f) Conference re; Werking v Werking

Anne:

I know that there is an open settlement offer until COB on Wednesday, but I think it would be wise if we established a date, sooner than later, for the 26(f) conference. I'm way too type A for my own good, and I want to get dates down so we don't blow through them, as it's going to be summer sooner than later.

I find these generally go better in person instead of on the phone.

I will let you choose the venue; I have very nice, rehabbed, Victorian era offices in downtown GH. I have a much more spartan workplace in Grand Rapids, where I live. Of course, your offices have a dog, so that's a big plus in my book. Wherever is most convenient for you works for me.

Can you give a few dates over the next couple of weeks? That way, we can get this scheduled and submitted to the court so we can get our Rule 16 scheduling order in.

Two asides: 1. I don't anticipate much discovery on our end. Obviously, depositions of both of your clients, but I believe we have most, if not all, of the written / ESI discovery we'll be seeking. I understand, however, that there will likely be more discovery requests from your side.

2. Do you have everything you need to turn over the property that you are currently holding of my client's? My main computer is in the shop, so I'm working a bit more off memory than I'm used to, so I want to confirm that I haven't dropped the ball on anything.

If there's anything else that I'm forgetting, please advise.

Thanks in advance,

Miles Greengard  
Attorney

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